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VIA HAND DELIVERY

Julius P. Knapp
Chief
Office of Engineering and Technology
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: ET Docket No. 07-113 (Unlicensed 60 GHz Band)

Dear Mr. Knapp:

I am hopeful that this letter will persuade the FCC to take action on the long-pending rule amendments it has proposed for the unlicensed 60 GHz band in the above-referenced proceeding.

As discussed in BridgeWave's prior filings, this matter has taken on a renewed urgency for our company. We have long been an industry leader in promoting the use of the millimeter wave bands as an alternative for providing gigabit-capacity backhaul for broadband networks. Interest in using the 60 GHz band for backhaul has increased even more due to the advent of pico cell deployments for advanced wireless networks, including 4G.

The FCC's rule proposals in the *Notice of Proposed Rulemaking* advance the FCC's broadband agenda and will extend to both large and small antennas alike. In particular, the EIRP proposal will bring the rules into line with current technology and eliminate ambiguities that prevent 60 GHz users from utilizing all of their authorized power (in the way, for example, that 39 GHz users are able to do). Presently, the rules are a model of spectrum inefficiency: transmitters using high gain point-to-point antennas in the band are forced to operate at power density levels far below those permitted under the Commission's RF safety requirements. In turn, this forces vendors to reduce transmit power to levels well below the maximum peak power permitted in Section 15.255(e).

This problem is having “real world” consequences that need to be addressed now. For example, on March 21, 2011, BridgeWave announced the introduction of PG60C, the first product in its new PicoHaul™ backhaul product family (the full press release is available at our website, www.bridgewave.com). As the name indicates, PG60C radios operate in the 60 GHz band. PG60C radios provide mobile operators with a cost-effective, physically unobtrusive solution for small-cell backhaul, or for filling in network “holes” between macro base stations. The proposed rule changes are essential for products like PG60C because, among other things, they will increase the range of 60 GHz links generally, thus allowing operators to deploy fewer radios to cover the same area. They will also enable a 60 GHz user to operate with a smaller antenna gain (without loss of link performance) where cost or size considerations mandate the use of smaller antennas with limited aperture dimensions.

This proceeding has now been pending for several years, with little substantive opposition (and BridgeWave has already addressed any outstanding issues in its previous filings). We have shown that we are willing to commit significant resources to developing precisely the type of backhaul alternatives that are essential to the success of the FCC’s National Broadband Plan. That commitment and associated risk-taking, however, require clear rules that keep pace with what is happening in the marketplace today. I therefore respectfully ask that the FCC do whatever it can to bring this matter to a successful conclusion as soon as possible.

Thank you for your consideration, and please do not hesitate to contact me if you have any questions.

Very truly yours,

/s/Amir Makleff

Amir Makleff
Chief Executive Officer

cc: Karen Ansari